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15 *Tasha Teherani-Ami, in her capacity as the Trustee of*
16 *the Sonja Dinihanian GST Trust DTS 01/01/11*

17 UNITED STATES BANKRUPTCY COURT
18 FOR THE DISTRICT OF OREGON

19 In re

20 15005 NW CORNELL LLC, and
21
22 VAHAN M. DINIHANIAN, JR.
23
24 Debtors.¹

Bankruptcy Case Nos.
19-31883-dwh11 (Lead Case)
19-31886-dwh11
Jointly Administered Under
Case No. 19-31883-dwh11

25 ¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification
26 number, are: 15005 NW Cornell LLC (5523) and Vahan M. Dinihanian, Jr. (0871) (Case No. 19-31886-
dwh11)).

15005 NW CORNELL LLC, an Oregon
limited liability corporation,

Plaintiff,

v.

TASHA TEHERANI-AMI, IN HER
CAPACITY AS THE TRUSTEE OF THE
SONJA DINIHANIAN GST TRUST DTS
01/01/11,

Defendant.

Adv. Proc. No. 20-03079-dwh

**STIPULATED MOTION FOR EXTENSION
OF TIME TO FILE SUMMARY
JUDGMENT MOTIONS**

MOTION

Counsel for plaintiff 15005 NW Cornell LLC (“**Cornell**”) and defendant Tasha Teherani-Ami, in her capacity as the Trustee of the Sonja Dinihanian GST Trust DTS 01/01/11 (the “**Trust**,” and together with Cornell the “**Parties**”) respectfully move the Court to enter an Order in the form of the attached (Exhibit 1) on a stipulated basis, extending the deadline for the Parties to file Summary Judgment Motions from August 3, 2021 to August 5, 2021.

In support of this motion, the Parties assert the following:

1. On June 29, 2021, the Court held a Continued Pretrial Conference at which the Parties agreed, as reflected in the Record of Proceeding (Dkt. 20), that Summary Judgment Motions would be filed on or before August 3, 2021.

2. The Parties have discussed the deadline and have mutually agreed the date should be extended by two days, from August 3, 2021 to August 5, 2021 and to respectfully convey that request on a stipulated basis to the Court.

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1 3. The Parties agree the remainder of the briefing and hearing schedule should remain the
2 same.

3 IT IS SO STIPULATED.

4 Dated: August 3, 2021

PERKINS COIE LLP

5 By: /s/ Douglas R. Pahl

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13 Counsel for Plaintiff and Debtor
14 15005 NW Cornell LLC

15 DATED: August 3, 2021

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25 Tasha Teherani-Ami, in her capacity as the
26 Trustee of the Sonja Dinihanian GST Trust DTS
 01/01/11

EXHIBIT 1

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9 UNITED STATES BANKRUPTCY COURT
10 FOR THE DISTRICT OF OREGON

11 In re

12 15005 NW CORNELL LLC, and

13 VAHAN M. DINIHANIAN, JR.

14 Debtors.¹

15
16 15005 NW CORNELL LLC, an Oregon
17 limited liability corporation,

18 Plaintiff,

19 v.

20 TASHA TEHERANI-AMI, IN HER
21 CAPACITY AS THE TRUSTEE OF THE
22 SONJA DINIHANIAN GST TRUST DTS
23 01/01/11,

24 Defendant.

Bankruptcy Case Nos.

19-31883-dwh11 (Lead Case)

19-31886-dwh11

Jointly Administered Under
Case No. 19-31883-dwh11

Adv. Proc. No. 20-03079-dwh

**ORDER GRANTING STIPULATED
MOTION FOR EXTENSION OF TIME
TO FILE SUMMARY JUDGMENT
MOTIONS**

25 ¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification
26 number, are: 15005 NW Cornell LLC (5523) and Vahan M. Dinihanian, Jr. (0871) (Case No. 19-31886-
dwh11)).

1 THIS MATTER came before the Court on plaintiff 15005 NW Cornell LLC (“**Cornell**”) and
2 defendant Tasha Teherani-Ami’s, in her capacity as the Trustee of the Sonja Dinihanian GST Trust DTS
3 01/01/11 (the “**Trust**,” and together with Cornell the “**Parties**”) Stipulated Motion for Extension of
4 Time to File Summary Judgment Motions (the “**Motion**”). The Court having reviewed the Motion, and
5 being otherwise duly advised, now, therefore,

6 IT IS HEREBY ORDERED as follows:

7 1. The deadline for the Parties to file Summary Judgment Motions is extended to August 5,
8 2021.

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11 Presented By:

12 **PERKINS COIE LLP**

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8 Counsel for Defendant and Creditor

9 *Tasha Teherani-Ami, in her capacity as the*

10 *Trustee of the Sonja Dinihanian GST Trust DTS*

11 *01/01/11*

1 **CERTIFICATE OF SERVICE**

2 The undersigned hereby certifies that on the date set forth below they caused the foregoing

3 **STIPULATED MOTION FOR EXTENSION OF TIME TO FILE SUMMARY JUDGMENT**

4 **MOTIONS** to be served via the CM/ECF system on the parties set forth below:

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8 Counsel for Defendant and Creditor
Tasha Teherani-Ami, in her capacity as the
9 *Trustee of the Sonja Dinihanian GST Trust DTS*
10 *01/01/11*

Counsel for Debtor
Vahan M. Dinihanian, Jr.

11
12 Dated: August 3, 2021

PERKINS COIE LLP

13 By: /s/ Douglas R. Pahl

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